

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ISRAEL SANCHEZ, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTENE CORP., MICHAEL F.
NEIDORFF, and JEFFREY A.
SCHWANEKE,

Defendants.

Case No. 4:17-cv-00806-AGF

**LEAD PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated June 23, 2020, Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund ("Lead Plaintiff"), on behalf of itself and the Settlement Class, will and does hereby move this Court, before the Honorable Audrey G. Fleissig, on October 26, 2020 at 10:00 a.m. Central time, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. This motion is based on (a) the Declaration of Jonathan D. Uslaner in Support of (I) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for

Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (c) all other papers and proceedings herein. A proposed Judgment and an Order granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: September 21, 2020

Respectfully submitted,

/s/ Michael J. Flannery
CUNEO GILBERT & LADUCA, LLP
Michael J. Flannery
Bar No. 52714 (MO)
mflannery@cuneolaw.com
7733 Forsyth Boulevard, Suite 1675
Clayton, MO 63105
Tel: (314) 226-1015
Fax: (202) 789-1813

Liaison Counsel for Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund and the Settlement Class

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
Jonathan D. Uslaner (*pro hac vice*)
jonathanu@blbglaw.com
Lauren M. Cruz (*pro hac vice*)
lauren.cruz@blbglaw.com
2121 Avenue of the Stars, Suite 2575
Los Angeles, CA 90067
Tel: (310) 819-3470

Counsel for Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund and Lead Counsel for the Settlement Class

**KLAUSNER, KAUFMAN, JENSEN &
LEVINSON**

Robert D. Klausner
bob@robertdklausner.com
7080 NW 4th Street
Plantation, Florida 33317
(954) 916-1202
(954) 916-1232 (fax)

*Additional Counsel for Louisiana Sheriffs' Pension
Relief Fund*

#1409024